

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: NASHVILLE, CITY OF	Operator ID#: 13030
Inspection Date(s): 2/2/2016, 2/3/2016 (Half)	Man Days: 1.5
Inspection Unit: NASHVILLE, CITY OF	
Location of Audit: Nashville	
Exit Meeting Contact: Blaine Middleton	
Inspection Type: Standard Inspection Plan Review- O and M	
Pipeline Safety Representative(s): Kevin Hecker	
Company Representative to Receive Report: Blaine Middleton	
Company Representative's Email Address: nashvillepw@sbcglobal.net	

Headquarters Address Information:	190 N. East Court Street Nashville, IL 62263 Emergency Phone#: (618) 327-8918 Fax#:	
Official or Mayor's Name:	Raymond Kolweier Phone#: (618) 327-8918 Email:	
Inspection Contact(s)	Title	Phone No.
Blaine Middleton	Utility Superintendent	

REPORTING PROCEDURES		Status
[192.605(b) (4)][191.5]	Does the operator's procedure require Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Satisfactory
<u>General Comment:</u> See O&M, Section 9.2, Page 1, Federal Reporting		
[192.605(b) (4)][191.9(a)]	Does the operator's procedure require a DOT Incident Report Form 7100.1 submitted within 30 days after detection of an incident?	Satisfactory
<u>General Comment:</u> See O&M, Section 9.2, Page 2, Reporting Procedures		
[192.605(b) (4)][191.9(b)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100.1)	Satisfactory

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<u>General Comment:</u>		
See O&M, Section 9.2, Page 2, Reporting Procedures		
[192.605(b) (4)][191.15(a)]	Does the operator's procedure require a DOT Incident Report Form 7100-2 submitted within 30 days after detection of an incident?	Not Applicable
<u>General Comment:</u>		
Nashville's gas system contains no transmission pipelines.		
[192.605(b) (4)][191.15(c)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100-2)	Not Applicable
<u>General Comment:</u>		
Nashville's gas system contains no transmission pipelines.		
[192.605(a)][191.25]	Does the operator's procedure require filing the SRCR within 5 days of determination, but not later than 10 days after discovery?	Satisfactory
<u>General Comment:</u>		
See O&M, Section 9.2, Page 2, Safety-Related Conditions		
[192.605(d)][191.23]	Does the operator's procedure contain instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions?	Satisfactory
<u>General Comment:</u>		
See O&M, Section 9.2, Pages 1 & 2, Typical Conditions		
[192.605(a)][191.29]	Does the operator's procedure contain requirements for gas transmission pipelines and liquefied natural gas facilities to submit geospatial data to PHMSA?	Not Applicable
<u>General Comment:</u>		
Nashville's gas system contains no transmission pipelines.		
[595.120.(a)]	Reports of Accidents: Does the operator have provisions for reporting accidents or damage to the ICC? (217-782-5050)	Satisfactory
<u>General Comment:</u>		
See O&M, Section 9.2, Page 1, Illinois Reporting		
CUSTOMER NOTIFICATION AND EFV INSTALLATION PROCEDURES		Status
[192.13(c)][192.16]	Does the operator have procedures for notifying new customers, within 90 days, of their responsibility for those sections of service not maintained by the operator?	Satisfactory
<u>General Comment:</u>		

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<i>The notification for customer's buried piping is located in Section 16 of the city ordinance and is located on the back of the application for natural gas service.</i>		
[192.13(c)][192.381]	Does the operator's procedure require that when an EFV is installed at a single family residence, the EFV shall, at a minimum, meet the performance requirements of §192.381?	Satisfactory
<u>General Comment:</u> <i>See O&M, Section 19, Page 1, Gas Connection, Installation & Abandonment Procedures for Polyethylene Pipe & Service Lines</i>		
INSTALLATION OF TRANSMISSION & DISTRIBUTION MAIN PIPE		Status
[192.13(c)][192.319]	Does the operator's procedure contain specifications for installation of transmission line or main in a ditch?	Satisfactory
<u>General Comment:</u> <i>See O&M, Section 21A, Page 1, Gas Main Installation and Abandonment</i>		
[192.13(c)][192.321]	Does the operator's procedure contain specifications for installation of plastic pipe in the ditch including a means of locating pipe?	Satisfactory
<u>General Comment:</u> <i>See O&M, Section 21A, Page 1, Gas Main Installation and Abandonment</i>		
[192.13(c)][192.323]	Does the operator's procedure contain casing requirements?	Satisfactory
<u>General Comment:</u> <i>The procedure for casing requirements are located in the GPTC transmission and distribution guide referenced in Section 6 of the O&M.</i>		
[192.13(c)][192.325]	Does the operator's procedure contain underground clearance specifications?	Satisfactory
<u>General Comment:</u> <i>See O&M, Section 19A, Page 3, Gas Connection, Installation and Abandonment Procedures</i>		
[192.13(c)][192.327]	Does the operator's procedure specify the amount of cover required for various types of installations?	Satisfactory
<u>General Comment:</u> <i>See O&M, Section 19A, Page 3, Gas Connection, Installation and Abandonment Procedures</i>		
[192.13(c)][192.321(g)]	Does the operator's procedure specify the time limitations for exposure to UV rays for PE pipe?	Satisfactory
<u>General Comment:</u> <i>See O&M, Section 21A, Page 4, Plastic Pipe Handling and Care. This section specifies that plastic pipe older than 2 years may not be used in the gas system.</i>		
SERVICE LINE INSTALLATION		Status
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as depth?	Satisfactory
<u>General Comment:</u>		

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See O&M, Section 19A, Page 3, Gas Connection, Installation and Abandonment Procedures for Polyethylene Pipe and Service Lines		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as support and backfill	Satisfactory
General Comment:		
See O&M, Section 19A, Page 4, Gas Connection, Installation and Abandonment Procedures for Polyethylene Pipe and Service Lines		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as protection against strain and loading	Satisfactory
General Comment:		
See O&M, Section 19A, Page 4, Gas Connection, Installation and Abandonment Procedures for Polyethylene Pipe and Service Lines		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line into a building	Satisfactory
General Comment:		
See O&M, Section 19A, Pages 1-4, Gas Connection, Installation and Abandonment Procedures for Polyethylene Pipe and Service Lines		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line under a building	Not Applicable
General Comment:		
Nashville does not install service lines under buildings.		
[192.13(c)][192.365]	Does the operator's procedure address service line valve location?	Satisfactory
General Comment:		
See O&M, Section 19A, Pages 1-4, Gas Connection, Installation and Abandonment Procedures for Polyethylene Pipe and Service Lines		
[192.13(c)][192.367]	Does the operator's procedure include specifications for service line connection to the main?	Satisfactory
General Comment:		
See O&M, Section 19A, Pages 1-4, Gas Connection, Installation and Abandonment Procedures for Polyethylene Pipe and Service Lines		
CUSTOMER METERS AND REGULATORS		Status
[192.13(c)][192.353]	Does the operator's procedure contain requirements for the location of meters and regulators?	Satisfactory
General Comment:		
See O&M, Section 20, Page 1, New Gas Meter Installations		
[192.13(c)][192.355]	Does the operator's procedure contain provisions to protect customer's meters and regulators from damage?	Satisfactory
General Comment:		

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<i>See O&M, Section 20, Page 1, New Gas Meter Installations</i>		
[192.13(c)][192.357(a)]	Does the operator's procedure require each regulator and meter to be installed so as to minimize anticipated stresses upon the connecting piping and the meter?	Satisfactory
<u>General Comment:</u>		
<i>See O&M, Section 20, Page 1, New Gas Meter Installations</i>		
[192.13(c)][192.357(d)]	Does the operator's procedure require each regulator that might release gas in its operation to be vented to the outside atmosphere?	Satisfactory
<u>General Comment:</u>		
<i>See O&M, Section 20, Page 1, New Gas Meter Installations</i>		
NORMAL OPERATING AND MAINTENANCE PROCEDURES		Status
[192.605(a)]	Does the operator's procedure require the O&M Plan to be reviewed and updated at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u>		
<i>The OQ Plan states in Section 1, D that a review of the Operations and Maintenance Manual and OQ plan is required once annually, not to exceed 15 months.</i>		
Does the operator's procedure require the OQ Plan to be reviewed and updated in connection with the O&M Plan review at a minimum of 1 per year/15 months?		Yes
Do procedures clearly include the name of the reviewer and dates of reviews?		Yes
[192.605(a)][192.605(b)(3)]	Does the operator's procedure require making construction records, maps, and operating history available to appropriate operating personnel?	Satisfactory
<u>General Comment:</u>		
<i>See O&M, Section 13, Pages 1-15. This section includes maps of the entire gas system.</i>		
[192.605(a)][192.605(b)(5)]	Does the operator's procedure contain provisions for start up and shut down of a pipeline to assure operation within MAOP plus allowable buildup?	Satisfactory
<u>General Comment:</u>		
<i>See O&M, Section 31, Page 1, Regulator Station Relief Valve Testing/Town Border Station</i>		
[192.605(a)][192.605(b)(8)]	Does the operator's procedure contain provisions for periodically reviewing the work done by operator's personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found?	Satisfactory
<u>General Comment:</u>		
<i>Section 1, D of the OQ Plan requires a periodic review of personnel's work during normal operations to determine if procedures are adequate.</i>		

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[192.605(a)][192.605(b)(9)]	Does the operator's procedure contain provisions taking for adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapors or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and a rescue harness and line? If not, then does the plan include prohibiting personnel from entering excavated trenches that may be hazardous?	Satisfactory
<u>General Comment:</u> See O&M, Section 19A, Page 3, Gas Connection, Installation and Abandonment Procedures for Polyethylene Pipe and Service Lines		
ABNORMAL OPERATING PROCEDURES FOR TRANSMISSION		Status
<u>Category Comment:</u> Nashville's gas system contains no transmission pipelines.		
[192.605(a)][192.605(c)(1)(i)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of unintended closure of valves or shut downs?	Not Applicable
[192.605(a)][192.605(c)(1)(ii)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate outside of normal operating limits?	Not Applicable
[192.605(a)][192.605(c)(1)(iii)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of loss of communications?	Not Applicable
[192.605(a)][192.605(c)(1)(iv)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of the operation of any safety device?	Not Applicable
[192.605(a)][192.605(c)(1)(v)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of any other foreseeable malfunction of a component, deviation from normal operations or personnel error?	Not Applicable
[192.605(a)][192.605(c)(2)]	Does the operator's procedure contain provisions for checking variations from normal operation after abnormal operations ended at sufficient critical locations?	Not Applicable
[192.605(a)][192.605(c)(3)]	Does the operator's procedure contain provisions for notifying the responsible operating personnel when notice of an abnormal operation is received?	Not Applicable
[192.605(a)][192.605(c)(4)]	Does the operator's procedure contain provisions for periodically reviewing the response of operating personnel to determine the effectiveness of the procedures and taking corrective action where deficiencies are found?	Not Applicable

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CHANGE IN CLASS LOCATION PROCEDURES		Status
[192.605(b) (1)][192.609]	Does the operator's procedure contain provisions for conducting a class location survey whenever an increase in populations density indicates a change in class location or a segment of an existing steel pipeline operating at a hoop stress that is more than 40 percent of SMYS, or indicates that the hoop stress corresponding to the established MAOP for a segment of existing pipeline is not commensurate with the present class location?	Satisfactory
General Comment: See O&M, Section 25, Page 1, Leak Survey & Continuing Surveillance Survey		
[192.605(b) (1)][192.611]	In the event a change in class location becomes necessary does the manual contain procedures for confirmation or revision of the MAOP?	Satisfactory
General Comment: See O&M, Section 25, Page 1, Leak Survey & Continuing Surveillance Survey		
CONTINUING SURVEILLANCE PROCEDURES		Status
[192.613(a)]	Does the operator's procedure include requirements for continuing surveillance of facilities to determine and take appropriate action concerning class location changes, failures, leak history, corrosion, cathodic protection requirements, and other unusual operating conditions?	Satisfactory
General Comment: See O&M, Section 25, Page 1, Leak Survey & Continuing Surveillance Survey		
[192.613(a)][192.613(b)]	Does the operator's procedure include requirements for reducing the MAOP, or other actions to be taken, if a segment of pipeline is in unsatisfactory condition?	Satisfactory
General Comment: See O&M, Section 25, Page 1, Leak Survey & Continuing Surveillance Survey		
[192.613(a)][192.459]	Does operator have procedures for determining if exposed cast iron was examined for evidence of graphitization and, if necessary, were remedial actions taken?	Not Applicable
General Comment: Nashville's gas system contains no cast iron pipe.		
[192.613(a)][192.489]	Does the operator's procedure include requirements for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history,	Not Applicable

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	or any other unusual operating maintenance conditions?	
<u>General Comment:</u> Nashville's gas system contains no cast iron pipe.		
DAMAGE PREVENTION PROGRAM PROCEDURES		Status
[192.605(a)][192.614(c)(1)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- identifies persons who engage in excavating?	Satisfactory
<u>General Comment:</u> See O&M, Section 16, Pages 1-3, Damage Prevention Program & JULIE Dig Notice Procedure		
[192.605(a)][192.614(c)(2)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides notification to the public in the One Call area?	Satisfactory
<u>General Comment:</u> See O&M, Section 16, Pages 1-3, Damage Prevention Program & JULIE Dig Notice Procedure		
[192.605(a)][192.614(c)(3)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides means for receiving and recording notifications of pending excavations?	Satisfactory
<u>General Comment:</u> See O&M, Section 16, Pages 1-3, Damage Prevention Program & JULIE Dig Notice Procedure		
[192.605(a)][192.614(c)(4)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides notification of pending excavations to the members?	Satisfactory
<u>General Comment:</u> See O&M, Section 16, Pages 1-3, Damage Prevention Program & JULIE Dig Notice Procedure		
[192.605(a)][192.614(c)(5)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides means of temporary marking for the pipeline in the vicinity of the excavations?	Satisfactory
<u>General Comment:</u> See O&M, Section 16, Pages 1-3, Damage Prevention Program & JULIE Dig Notice Procedure		
[192.605(a)][192.614(c)(6)(i)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- Inspection	Satisfactory

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	must be done to verify integrity of the pipeline?	
General Comment: See O&M, Section 16, Pages 1-3, Damage Prevention Program & JULIE Dig Notice Procedure		
[192.605(a)][192.614(c)(6)(ii)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- After blasting, a leak survey must be conducted as part of the inspection by the operator?	Satisfactory
General Comment: See O&M, Section 16, Pages 1-3, Damage Prevention Program & JULIE Dig Notice Procedure		
Has the Operator adopted the applicable Common Ground Alliance Best Practices?		Yes
Does the operator have adequate directional drilling/boring procedures to determine effective actions to protect their underground facilities from the dangers posed by directional drilling and other trenchless technology? A pipeline operator's damage prevention program shall include actions to protect their facilities when directional drilling operations are conducted in proximity to the pipeline. These procedures should include, but are not limited to, accurately locating underground piping and reviewing personnel qualifications?		Yes
[IL ADM. CO.265.100(b)]	Does the operator have procedures to report third party damage to mains, when a release of gas occurs, reported to ICC JULIE Enforcement?	Satisfactory
General Comment: See O&M, Section 16, Pages 1-3, Damage Prevention Program & JULIE Dig Notice Procedure		
EMERGENCY PROCEDURES		Status
[192.615(a)(1)]	Does the operator have procedures for receiving, identifying, and classifying notices of events, such as, gas odor inside or near a building?	Satisfactory
General Comment: See O&M, Section 12 (Emergency Plan), Page 5, Part A, Smell Gas Inside Building		
[192.615(a)(2)]	Does the operator have procedures for establishing and maintaining communication with appropriate public officials regarding a possible emergency?	Satisfactory
General Comment: See O&M, Section 12 (Emergency Plan), Page 12		
[192.615(a)(3)(i)]	Does the operator have procedures for prompt response to gas detected inside or near a building?	Satisfactory
General Comment: See O&M, Section 12 (Emergency Plan), Page 5, Part A, Smell Gas Inside Building		

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[192.615(a)(3)(ii)]	Does the operator have procedures for prompt response to a fire located near a pipeline?	Satisfactory
<u>General Comment:</u> See O&M, Section 12 (Emergency Plan), Page 2, General		
[192.615(a)(3)(iii)]	Does the operator have procedures for prompt response to an explosion near a pipeline?	Satisfactory
<u>General Comment:</u> See O&M, Section 12 (Emergency Plan), Page 2, General		
[192.615(a)(3)(iv)]	Does the operator have procedures for prompt response to natural disasters?	Satisfactory
<u>General Comment:</u> See O&M, Section 12 (Emergency Plan), Page 2, General		
[192.615(a)(4)]	Does the operator have procedures for the availability of personnel, equipment, instruments, tools, and material required at the scene of an emergency?	Satisfactory
<u>General Comment:</u> See O&M, Section 12 (Emergency Plan), Page 13		
[192.615(a)(5)]	Does the operator have procedures for actions directed towards protecting people first, then property?	Satisfactory
<u>General Comment:</u> See O&M, Section 12 (Emergency Plan), Page 2, General		
[192.615(a)(6)]	Does the operator have procedures for emergency shutdown or pressure reduction to minimize hazards to life or property?	Satisfactory
<u>General Comment:</u> See O&M, Section 12 (Emergency Plan), Page 9		
[192.615(a)(7)]	Does the operator have procedures to require making safe any actual or potential hazard to life or property?	Satisfactory
<u>General Comment:</u> See O&M, Section 12 (Emergency Plan), Page 3		
[192.615(a)(8)]	Does the operator have procedures requiring the notification of appropriate public officials required at the emergency scene and coordinating planned and actual responses with these officials?	Satisfactory
<u>General Comment:</u> See O&M, Section 12 (Emergency Plan), Page 12		
[192.615(a)(9)]	Does the operator have procedures for restoring	Satisfactory

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	service outages after the emergency has been rendered safe?	
<u>General Comment:</u> See O&M, Section 12 (Emergency Plan), Page 11, Restoring Service		
[192.615(a)(10)]	Does the operator have procedures for investigating accidents and failures as soon as possible after the emergency?	Satisfactory
<u>General Comment:</u> See O&M, Section 12 (Emergency Plan), Page 2, General		
[192.615(b)(1)]	Does the operator have procedures for furnishing applicable portions of the emergency plan to supervisory personnel who are responsible for emergency action?	Satisfactory
<u>General Comment:</u> See O&M, Section 12 (Emergency Plan), Page 14		
[192.615(b)(2)]	Does the operator have procedures for training appropriate employees as to the requirements of the emergency plan and verifying effectiveness of training?	Satisfactory
<u>General Comment:</u> See O&M, Section 12 (Emergency Plan), Page 14		
[192.615(b)(3)]	Does the operator have procedures for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?	Satisfactory
<u>General Comment:</u> See O&M, Section 12 (Emergency Plan), Page 17		
[192.615(c)]	Does the operator have procedures to establish and maintain liaison with appropriate public officials, such that both the operator and public officials are aware of each other's resources and capabilities in dealing with gas emergencies?	Satisfactory
<u>General Comment:</u> See O&M, Section 12 (Emergency Plan), Page 14		
Does the operator have procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings?		Yes
<u>General Comment:</u> See O&M, Section 12 (Emergency Plan), Page 3		

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FAILURE INVESTIGATION PROCEDURES		Status
[192.617]	Does the operator have procedures for analyzing accidents and failures, including laboratory analysis where appropriate, to determine cause and prevention of recurrence?	Satisfactory
General Comment: <i>See O&M, Section 11, Pages 1-6, Investigation of Emergencies</i>		
MAOP PROCEDURES		Status
[192.605(b) (1)][192.621]	Does the operator have procedures for establishing the MAOP for High Pressure Distribution Systems?	Satisfactory
General Comment: <i>See O&M, Section 35, Page 1, MAOP & System Operating Records</i>		
[192.605(b) (1)][192.623]	Does the operator have procedures for establishing the Minimum and Maximum Allowable Operating Pressure for Low Pressure Distribution Systems?	Not Applicable
General Comment: <i>Nashville's gas system is not a low-pressure distribution system.</i>		
[192.605(b) (1)][192.619(a)(1)]	Is MAOP determined by design and test? or	Satisfactory
General Comment: <i>MAOP was determined by design and test.</i>		
[192.605(b) (1)][192.619(a)(2)]	Does the operator have procedures requiring the MAOP to be determined by test pressure divided by applicable factor?	Satisfactory
General Comment: <i>See O&M, Section 19, Page 6</i>		
[192.605(b) (1)][192.619(a)(3)]	Does the operator have procedures requiring the MAOP to be determined by highest operating pressure to which the segment of line was subjected between July 1, 1965 and July 1, 1970?	Satisfactory
General Comment: <i>The procedure is located on page 254 of the GPTC guide referenced in Section 6 of the O&M.</i>		
[192.605(b) (1)][192.619(a)(4)]	Does the operator have procedures requiring the MAOP to be determined by the maximum safe pressure determined by operator?	Satisfactory
General Comment: <i>The procedure is located on page 254 of the GPTC guide referenced in Section 6 of the O&M.</i>		
[192.605(b) (1)][192.619(b)]	Does the operator have procedures requiring	Satisfactory

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	overpressure devices be installed if .619 (a) (4) is applicable?	
General Comment: <i>See O&M, Section 31, Page 1, Regulator Station Relief Valve Testing</i>		
[192.605(b) (5)]	Does the operator have procedures for start up and shut down within MAOP of the pipeline?	Satisfactory
General Comment: <i>The procedure is located on page 254 of the GPTC guide referenced in Section 6 of the O&M.</i>		
Does the operator install pipelines to operate under alternative MAOP requirements?		No
[192.605(b) (1)][192.620(b) (4)]	If yes, does the operator have procedures to require the additional construction requirements included under 192.328?	Not Applicable
General Comment: <i>Nashville does not have any pipelines operating at an alternative MAOP.</i>		
[192.13(c)][192.328(b)]	If yes, does the operator have procedures requiring all girth welds to be non-destructively tested in accordance with 192.243 (b) and (c)?	Not Applicable
General Comment: <i>Nashville does not have any pipelines operating at an alternative MAOP.</i>		
PRESSURE TEST PROCEDURES		Status
[192.13(c)]	Does the plan allow for the use of pre-tested pipe for repairs?	Not Applicable
General Comment: <i>The O&M does not allow for the use of pre-tested pipe for repairs.</i>		
[192.13(c)][192.503(a)(1)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until it is pressure tested in accordance with this subpart and §192.619 to substantiate the maximum allowable operating pressure; and	Satisfactory
General Comment: <i>See O&M, Section 19, Page 6, General Requirements</i>		
[192.13(c)][192.503(a)(2)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until all potentially hazardous leaks have been located and eliminated?	Satisfactory
General Comment:		

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See O&M, Section 19, Page 6, General Requirements		
[192.13(c)][192.503(b)(1),192.503(b)(2),192.503(b)(3)]	Does the operator's procedure indicate that, for a new segment of pipeline, or a segment of pipeline that has been relocated or replaced, the pressure test medium must be liquid, air, natural gas, or inert gas that is compatible with the material of which the pipeline is constructed, relatively free of sedimentary materials, and except for natural gas, nonflammable?	Satisfactory
<u>General Comment:</u>		
See O&M, Section 19, Page 6, General Requirements		
[192.13(c)][192.503(d)]	Does the operator's procedure indicate that each joint used to tie in a test segment of pipeline is excepted from the specific test requirements of this subpart, but each non-welded joint must be leak tested at not less than its operating pressure?	Satisfactory
<u>General Comment:</u>		
See O&M, Section 19, Page 6, General Requirements		
[192.13(c)][192.503(e)]	Does the operator's procedure require a strength test for pipeline components other than pipe if not certified by manufacturer?	Satisfactory
<u>General Comment:</u>		
See O&M, Section 19, Page 6, General Requirements		
[192.13(c)][192.505(a)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more which are based on class location?	Satisfactory
<u>General Comment:</u>		
See O&M, Section 19, Pages 6 & 7, Strength Test Requirements		
[192.13(c)][192.505(c)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more to be tested at or above the required test pressure for at least 8 hour?	Satisfactory
<u>General Comment:</u>		
See O&M, Section 19, Page 7, Strength Test Requirements		
[192.13(c)][192.505(d)]	Except for service lines, Does the operator's procedure include requirements for fabricated units and short sections of pipe which operates at a hoop stress of 30% or more of SMYS and for which a post installation test is impractical, that a pre-installation strength test must be conducted by maintaining the pressure for at least 4 hours?	Satisfactory

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<u>General Comment:</u> See O&M, Section 19, Page 7, Strength Test Requirements		
[192.13(c)][192.507]	Does the operator's procedure include requirements for testing pipelines, which operate at a hoop stress less than 30% of SMYS and at or above 100 psig?	Satisfactory
<u>General Comment:</u> See O&M, Section 19, Page 7, Strength Test Requirements		
[192.13(c)][192.509(b)]	Does the operator's procedure include requirements for testing steel main which operate below 100 psig at a minimum of 10 psig for main that operates below 1 psig and for each steel main to operate below 100 psig test to a minimum of 90 psig for main that operates over 1 psig?	Satisfactory
<u>General Comment:</u> See O&M, Section 19, Page 3		
[192.13(c)][192.511(b)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure as follows: 50 psig if the line operates over 40 psig?	Satisfactory
<u>General Comment:</u> See O&M, Section 19, Page 3		
[192.13(c)][192.511(c)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure of 90 psig if the line operates over 40 psig, unless the service line is stressed to 20% or more SMYS then testing must be conducted in accordance with 192.507?	Satisfactory
<u>General Comment:</u> See O&M, Section 19, Page 8, Test Requirements for Service Lines		
[192.13(c)][192.513(b)]	Does the operator's procedure insure discovery of all potentially hazardous leaks in the segment being tested?	Satisfactory
<u>General Comment:</u> See O&M, Section 19, Page 7, Test Requirements		
[192.13(c)][192.513(c)]	Does the operator's procedure include test requirements for plastic pipelines of 150% of MOP or 50 psig whichever is greater?	Satisfactory
<u>General Comment:</u> See O&M, Section 19, Page 8, Test Requirements for Plastic Pipelines		

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[191.13(c)][192.513(d)]	Does the operator's procedures require that when testing thermoplastic material the temperature may not be more than 100 F or the temperature at which the material's long-term hydrostatic strength has been determined under the listed specification, whichever is greater?	Satisfactory
<u>General Comment:</u> <i>See O&M, Section 19, Page 8, Test Requirements for Plastic Pipelines</i>		
[192.13(c)][192.517(a)(1)]	Does the plan require test records for pipelines that operate over 100 psig that include: Operators name, responsible employee's name, name of testing company?	Satisfactory
<u>General Comment:</u> <i>The procedures are located on Page 208 of the GPTC manual referenced in Section 6 of the O&M.</i>		
[192.13(c)][192.517(a)(2)]	Does the plan require test records for pipelines that operate over 100 psig that include test medium?	Satisfactory
<u>General Comment:</u> <i>The procedures are located on Page 208 of the GPTC manual referenced in Section 6 of the O&M.</i>		
[192.13(c)][192.517(a)(3)]	Does the plan require test records for pipelines that operate over 100 psig that include test pressure?	Satisfactory
<u>General Comment:</u> <i>The procedures are located on Page 208 of the GPTC manual referenced in Section 6 of the O&M.</i>		
[192.13(c)][192.517(a)(4)]	Does the plan require test records for pipelines that operate over 100 psig that include test duration?	Satisfactory
<u>General Comment:</u> <i>The procedures are located on Page 208 of the GPTC manual referenced in Section 6 of the O&M.</i>		
[192.13(c)][192.517(a)(5)]	Does the plan require test records for pipelines that operate over 100 psig that include pressure recording charts of readings?	Satisfactory
<u>General Comment:</u> <i>The procedures are located on Page 208 of the GPTC manual referenced in Section 6 of the O&M.</i>		
[192.13(c)][192.517(a)(7)]	Does the plan require test records for pipelines that operate over 100 psig that include leaks and failures noted?	Satisfactory
<u>General Comment:</u> <i>The procedures are located on Page 208 of the GPTC manual referenced in Section 6 of the O&M.</i>		
ODORIZATION of GAS PROCEDURES		Status
[192.605(b) (1)][192.625(a)]	Does the operator's procedure include a requirement	Satisfactory

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	that distribution lines must contain odorized gas?	
<u>General Comment:</u> See O&M, Section 37, Pages 1 & 2, Verification of Odorization		
[192.605(b) (1)][192.625(b)]	Does the operator's procedure require odorized gas in Class 3 or 4 locations (if applicable)?	Not Applicable
<u>General Comment:</u> Nashville's gas system contains no transmission pipelines.		
[192.605(b) (1)][192.625(f)]	Does the operator's procedure require periodic gas sampling, using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable?	Satisfactory
<u>General Comment:</u> See O&M, Section 37, Pages 1 & 2, Verification of Odorization		
TAPPING PIPELINES UNDER PRESSURE PROCEDURES		Status
[192.605(b) (1)][192.627]	Does the plan provide for adequate tapping procedures for pipelines under pressure?	Satisfactory
<u>General Comment:</u> See O&M, Section 17, Page 1. Section 17 also incorporates the manual from the equipment manufacturer.		
[192.605(b) (1)][192.627]	Does the operator's procedure require that hot taps be made by a qualified crew?	Satisfactory
<u>General Comment:</u> See O&M, Section 17, Page 1.		
PIPELINE PURGING PROCEDURES		Status
[192.605(b) (1)][192.629(a)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing air must be properly purged?	Satisfactory
<u>General Comment:</u> Purging procedures are located in page 268 of the GPTC Guide for Transmission and Distribution Operator's Manual which is referenced in Section 6 of the O&M.		
[192.605(b) (1)][192.629(b)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing gas must be properly purged?	Satisfactory
<u>General Comment:</u> Purging procedures are located in page 268 of the GPTC Guide for Transmission and Distribution Operator's Manual which is referenced in Section 6 of the O&M.		
MAINTENANCE PROCEDURES		Status

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[192.605(a)][192.703(b)]	Does the operator's procedure require that each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service?	Satisfactory
<u>General Comment:</u> See O&M, Section 17, Pages 1-3, Underground Leak Procedure		
[192.605(a)][192.703(c)]	Does the operator's procedure require that hazardous leaks must be repaired promptly?	Satisfactory
<u>General Comment:</u> See O&M, Section 15, Pages 1-4. Section 15 also incorporates Leak Classification and Action Criteria from page 524 of the GPTC Guide for Gas Transmission and Distribution Piping Systems - 2009 Edition.		
TRANSMISSION LINES - PATROLLING & LEAKAGE SURVEY PROCEDURES		Status
<u>Category Comment:</u> Nashville's gas system contains no transmission pipelines.		
[192.605(b) (1)][192.705(a)]	Does the operator's procedure require patrolling of surface conditions on and adjacent to transmission line right of way for indications of leak, construction activities, and other factors affecting safety and operations?	Not Applicable
[192.605(b) (1)][192.705(b)]	Does the operator's procedure require that the frequency of patrols is to be determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in .705(b)?	Not Applicable
[192.605(b) (1)][192.706]	Does the operator's procedure require leakage surveys at a minimum of 1 year/15 months	Not Applicable
[192.605(b) (1)][192.706(a)]	Does the operator's procedure include leak detector equipment survey requirements for transmission lines transporting un-odorized gas in Class 3 locations 7½ months but at least twice each calendar year?	Not Applicable
[192.605(b) (1)][192.706(b)]	Does the operator's procedure include leak detector equipment survey requirements for lines transporting un-odorized gas in Class 4 locations - 4½ months but at least 4 times each calendar year?	Not Applicable
DISTRIBUTION SYSTEM PATROLLING & LEAKAGE SURVEY PROCEDURES		Status
[192.605(b) (1)][192.721(a)]	Does the operator's procedure require the frequency of patrolling mains to be determined by the severity of the conditions which could cause failure or leakage?	Satisfactory
<u>General Comment:</u> See O&M, Section 27, Page 1, Foot Patrol of High Pressure Distribution Line		
[192.605(b) (1)][192.721(b)(1)]	Does the operator's procedure require that mains in places or on structures where anticipated physical	Satisfactory

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	movement or external loading could cause failure or leakage must be patrolled in business districts at intervals not exceeding 4½ months, but at least four times each calendar year? and	
General Comment: See O&M, Section 27, Page 1, Foot Patrol of High Pressure Distribution Line		
[192.605(b) (1)][192.721(b)(2)]	Does the operator's procedure require that mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled outside business districts at intervals not exceeding 7½ months, but at least twice each calendar year?	Not Applicable
General Comment: Nashville's gas system does not contain mains within the business district that meet the requirements of this code part.		
[192.605(b) (1)][192.723(b)(1)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment in business districts as specified, 1/yr (15 months)?	Satisfactory
General Comment: See O&M, Section 15, Page 1, Leak Survey and Continuing Surveillance Survey		
[192.605(b) (1)][192.723(b)(2)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment outside of business districts as specified, once every 5 calendar years/63 mos.; for unprotected lines subject to .465(e) where electrical surveys are impractical, once every 3 years/39 mos.	Satisfactory
General Comment: See O&M, Section 15, Page 1, Leak Survey and Continuing Surveillance Survey		
LINE MARKER PROCEDURES		Status
[192.605(b) (1)][192.707]	Does the operator's procedure require that line markers be installed and labeled as required?	Satisfactory
General Comment: See O&M, Section 38, Page 1, Gas Line Markers		
TRANSMISSION RECORD KEEPING PROCEDURES		Status
Category Comment: Nashville's gas system contains no transmission pipelines.		
[192.605(b) (1)][192.709(a)]	Does the operator's procedure require that records	Not Applicable

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	must be maintained on repairs to the pipe for the life of the system?	
[192.605(b) (1)][192.709(b)]	Does the operator's procedure require that records must be maintained on repairs to "other than pipe" for 5 years?	Not Applicable
[192.605(b) (1)][192.709(c)]	Does the operator's procedure require that records must be maintained for Operation (Sub L) and Maintenance (Sub M) patrols, surveys, tests for 5 years or until next completion of the next inspection cycle?	Not Applicable
TRANSMISSION FIELD REPAIR PROCEDURES		Status
<u>Category Comment:</u> Nashville's gas system contains no transmission pipelines.		
[192.605(b) (1)][192.713(a)(1)]	Does the operator's procedure require that each imperfection or damage that impairs the serviceability of pipe in a steel transmission line operating at or above 40 percent of SMYS must be removed by cutting out and replacing a cylindrical piece of pipe; OR must be repaired by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	Not Applicable
[192.605(b) (1)][192.713(b)]	Does the operator's procedure require that the operating pressure must be at a safe level during repair operations?	Not Applicable
[192.605(b) (1)][192.715(a)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 if the segment of transmission line is taken out of service?	Not Applicable
[192.605(b) (1)][192.715(b)(1)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the weld is not leaking?	Not Applicable
[192.605(b) (1)][192.715(b)(2)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the pressure is reduced to produce a stress that is 20% of SMYS?	Not Applicable

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[192.605(b) (1)][192.715(b)(3)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the grinding is limited so that 1/8 inch thickness of pipe weld remains?	Not Applicable
[192.605(b) (1)][192.715(c)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) and cannot be repaired in accordance with .715(a) or .715(b) then a full encirclement welded split sleeve of appropriate design must be installed?	Not Applicable
[192.605(b) (1)][192.717(a)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by removing the leak by cutting out and replacing a cylindrical piece of pipe? OR	Not Applicable
[192.605(b) (1)][192.717(b)(1)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a full encirclement welded split sleeve of appropriate design, unless the transmission line is joined by mechanical couplings and operates at less than 40 percent of SMYS? OR	Not Applicable
[192.605(b) (1)][192.717(b)(2)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a properly designed bolt-on-leak clamp if the leak is due to a corrosion pit? OR	Not Applicable
[192.605(b) (1)][192.717(b)(3)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is due to a corrosion pit and on pipe of not more than 40,000 psi (267 Mpa) SMYS, fillet weld over the pitted area a steel plate patch with rounded corners, of the same or greater thickness than the pipe, and not more than one-half of the diameter of the pipe in size? OR	Not Applicable
[192.605(b) (1)][192.717(b)(4)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is on a submerged pipeline in inland navigable waters, mechanically apply a full encirclement split sleeve of appropriate design? OR	Not Applicable
[192.605(b) (1)][192.717(b)(5)]	Does the operator's procedure require that each permanent field repair of a leak on a transmission line must be made by applying a method that reliable engineering tests and analyses show can permanently	Not Applicable

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	restore the serviceability of the pipe?	
[192.605(b) (1)][192.719(a)]	Does the operator's procedure require that replacement pipe must be pressure tested to meet the requirements of a new pipeline?	Not Applicable
[192.605(b) (1)][192.719(b)]	Does the operator's procedure require that for lines of 6-inch diameter or larger and that operate at 20% of more of SMYS, the repair must be nondestructively tested in accordance with §192.241(c)?	Not Applicable
TEST REQUIREMENTS FOR REINSTATING SERVICE LINES		Status
[192.605(b) (1)][192.725(a)]	Does the operator's procedure require that disconnected service lines must be tested the same as a new service line?	Satisfactory
General Comment: See O&M, Section 19, Pages 1-4, Gas Connection, Installation & Abandonment Procedures		
[192.605(b) (1)][192.725(b)]	Does the operator's procedure require that service lines that are temporarily disconnected must be tested from the point of disconnection, the same as a new service line, before reconnect?	Satisfactory
General Comment: See O&M, Section 19, Pages 1-4, Gas Connection, Installation & Abandonment Procedures		
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
[192.605(b) (1)][192.727(b)]	Does the operator's procedure require disconnecting both ends, purge, and seal each end before abandonment or a period of deactivation where the pipeline is not being maintained?	Satisfactory
General Comment: See O&M, Section 21, Page 4, Abandonment		
[192.605(b) (1)][192.727(c)]	Does the operator's procedure require that, except for service lines, each inactive pipeline that is not being maintained under Part 192 must be disconnected from all gas sources/supplies, purged, and sealed at each end?	Satisfactory
General Comment: See O&M, Section 21, Page 4, Abandonment		
[192.605(b) (1)][192.727(d)(1)]	Does the operator's procedure require that whenever service to a customer is discontinued the valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means	Satisfactory

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	designed to prevent the opening of the valve by persons other than those authorized by the operator? OR	
<u>General Comment:</u> <i>The procedure for discontinuing service to a customer are located in Section G, Page 16-18 of the Operators of Small Gas Systems Guide referenced in Section 6 of the O&M.</i>		
[192.605(b) (1)][192.727(d)(2)]	Does the operator's procedure require that whenever service to a customer is discontinued a mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly? OR	Satisfactory
<u>General Comment:</u> <i>The procedure for discontinuing service to a customer are located in Section G, Page 16-18 of the Operators of Small Gas Systems Guide referenced in Section 6 of the O&M.</i>		
[192.605(b) (1)][192.727(d)(3)]	Does the operator's procedure require that whenever service to a customer is discontinued the customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed?	Satisfactory
<u>General Comment:</u> <i>The procedure for discontinuing service to a customer are located in Section G, Page 16-18 of the Operators of Small Gas Systems Guide referenced in Section 6 of the O&M.</i>		
[192.605(b) (1)][192.727(e)]	Does the operator's procedure require that if air is used for purging, the operator shall ensure that a combustible mixture is not present after purging?	Satisfactory
<u>General Comment:</u> <i>See O&M, Section 21A, Page 4, Abandonment</i>		
[192.605(b) (1)][192.727(f)]	Does the operator's procedure require that each abandoned vault be filled with a suitable compacted material?	Not Applicable
<u>General Comment:</u> <i>Nashville's gas system contains no vaults.</i>		
[192.605(b) (1)][192.727(g)]	Does the operator's procedure require that the operator must file reports upon abandoning underwater facilities crossing commercially navigable waterways, including offshore facilities?	Not Applicable
<u>General Comment:</u> <i>Nashville's gas system contains no pipelines that cross a commercially navigable waterway.</i>		
COMPRESSOR STATION PROCEDURES		Status
<u>Category Comment:</u> <i>Nashville's gas system contains no compressor stations.</i>		

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[192.605(b)(7)][192.605(b)(6)]	Does the operator's procedure include provisions for isolating units or sections of pipe and for purging before returning to service?	Not Applicable
[192.605(b)(7)][192.605(b)(7)]	Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices?	Not Applicable
[192.605(b)(7)][192.731]	Does the operator's procedure require inspection and testing for remote control shutdowns and pressure relieving devices at a minimum of 1 per yr/15 months), prompt repair or replacement?	Not Applicable
[192.605(b)(7)][192.731(b)]	Does the operator's procedure require when any defective or inadequate relief device is found that it must be promptly repaired or replaced?	Not Applicable
[192.605(b)(7)][192.735(a)]	Does the operator's procedure require storage of excess flammable or combustible materials at a safe distance from the compressor buildings?	Not Applicable
[192.605(b)(7)][192.735(b)]	Does the operator's procedure require above ground storage tanks to be protected according to NFPA #30; Amdt 192-103 pub. 06/09/06 eff. 07/10/06?	Not Applicable
[192.605(b)(7)][192.736(a)(1)]	Does the operator's procedure require that compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: 50% of the upright side areas are permanently open? OR	Not Applicable
[192.605(b)(7)][192.736(a)(2)]	Does the operator's procedure require compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: It is an unattended field compressor station of 1000 hp or less?	Not Applicable
PRESSURE LIMITING and REGULATING STATION PROCEDURES		Status
[192.605(b)(1)][192.739(a)(1)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is in good mechanical condition?	Satisfactory
<u>General Comment:</u> See O&M, Section 31, Pages 1-4, Regulator Station, Relief Valve Testing, Town Border Station		
[192.605(b)(1)][192.739(a)(2)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is adequate from the standpoint of capacity	Satisfactory

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	and reliability of operation for the service in which it is employed	
<u>General Comment:</u>		
See O&M, Section 31, Pages 1-4, Regulator Station, Relief Valve Testing, Town Border Station		
[192.605(b) (1)][192.739(a)(3)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is set to control or relieve at correct pressures consistent with .201(a), except for .739(b).	Satisfactory
<u>General Comment:</u>		
See O&M, Section 31, Pages 1-4, Regulator Station, Relief Valve Testing, Town Border Station		
[192.605(b) (1)][192.739(a)(4)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is properly installed and protected from dirt, liquids, and other conditions that may prevent proper operation.	Satisfactory
<u>General Comment:</u>		
See O&M, Section 31, Pages 1-4, Regulator Station, Relief Valve Testing, Town Border Station		
[192.605(b) (1)][192.739(b)]	Does the operator's procedure require steel pipelines whose MAOP is determined under §192.619(c), if the MAOP is 60 psi (414 kPa) gauge or more, the control or relief pressure limit is as required by .739 (b).	Satisfactory
<u>General Comment:</u>		
See O&M, Section 31, Pages 1-4, Regulator Station, Relief Valve Testing, Town Border Station		
[192.605(b) (1)][192.741(a)]	Does the operator's procedure require telemetering or recording pressure gauges to be in place to indicate gas pressure in the district that is supplied by more than one regulating station?	Satisfactory
<u>General Comment:</u>		
See O&M, Section 31, Pages 1-4, Regulator Station, Relief Valve Testing, Town Border Station		
[192.605(b) (1)][192.741(b)]	Does the operator's procedure require the operator to determine the need in a distribution system supplied by only one district station?	Satisfactory
<u>General Comment:</u>		
See O&M, Section 35, Page 1, MAOP and System Operating Records and Section 36, Page 1, System Pressure Check		
[192.605(b) (1)][192.741(c)]	Does the operator's procedure require the operator to inspect equipment and take corrective measures when there are indications of abnormally high or low	Satisfactory

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	pressure?	
General Comment: See O&M, Section 36, Page 1, System Pressure Check		
[192.605(b) (1)][192.743(a)]	Does the operator's procedure require that capacity must be consistent with .201(a) except for .739(b), and be determined at a minimum of 1 per yr/15 months?	Satisfactory
General Comment: See O&M, Section 31, Pages 1-4, Regulator Station, Relief Valve Testing, Town Border Station		
[192.605(b) (1)][192.743(b)]	If the capacities are calculated, Does the operator's procedure require them to be compared with the rated or experimentally determined relieving capacity of the device for the conditions under which it operates?	Satisfactory
General Comment: See O&M, Section 31, Pages 1-4, Regulator Station, Relief Valve Testing, Town Border Station		
[192.605(b) (1)][192.743(c)]	Does the operator's procedure require new or additional devices be installed to provide required capacity if insufficient capacity exists?	Satisfactory
General Comment: See O&M, Section 31, Pages 1-4, Regulator Station, Relief Valve Testing, Town Border Station		
VALVE AND VAULT MAINTENANCE PROCEDURES		Status
[192.605(b) (1)][192.745(a)]	Does the operator's procedure require that each transmission valve that might be required during an emergency is inspected and partially operated at a minimum of 1 per year/15 months?	Not Applicable
General Comment: Nashville's gas system contains no transmission pipelines.		
[192.605(b) (1)][192.745(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any transmission valve found inoperable, unless the operator designates an alternative valve?	Not Applicable
General Comment: Nashville's gas system contains no transmission pipelines.		
[192.605(b) (1)][192.747(a)]	Does the operator's procedure require that each distribution valve that might be required during an emergency is checked and serviced at a minimum of 1 per year/15 months?	Satisfactory
General Comment: See O&M, Section 28, Page 1, Key Valve Inspections		

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[192.605(b) (1)][192.747(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any valve found inoperable, unless the operator designates an alternative valve?	Satisfactory
<u>General Comment:</u> See O&M, Section 28, Page 1, Key Valve Inspections		
[192.605(b) (1)][192.749]	Does the operator's procedure require that vaults greater than 200 cubic feet must be inspected at a minimum of 1 per year/15 months?	Not Applicable
<u>General Comment:</u> Nashville's gas system contains no vaults.		
[192.13(c)][192.179(a)]	Does the operator's procedure specify the minimum spacing requirements for transmission sectionalizing block valves?	Not Applicable
<u>General Comment:</u> Nashville's gas system contains no transmission pipelines.		
[192.13(c)][192.179(c)]	Does the operator's procedure require between each transmission main line valve to have a blowdown valve with enough capacity to allow for as rapid blow down as practicable?	Not Applicable
<u>General Comment:</u> Nashville's gas system contains no transmission pipelines.		
PREVENTION of ACCIDENTAL IGNITION PROCEDURES		Status
[192.605(b) (1)][192.751(a)]	Does the operator's procedure require that when a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided?	Satisfactory
<u>General Comment:</u> See O&M, Section 19A, Page 5 and Section 21A, Page 3.		
[192.605(b) (1)][192.751(b)]	Does the operator's procedure prohibit gas or electric welding or cutting on pipe or on pipe components that contain a combustible mixture of gas and air in the area of work?	Satisfactory
<u>General Comment:</u> See O&M, Section 19A, Page 5 and Section 21A, Page 3.		
[192.605(b) (1)][192.751(c)]	Does the operator's procedure require that warning signs will be posted, where appropriate?	Satisfactory

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<u>General Comment:</u> See O&M, Section 19A, Page 5 and Section 21A, Page 3.		
CAULKED BELL AND SPIGOT JOINTS PROCEDURES		Status
<u>Category Comment:</u> Nashville's gas system contains no cast iron pipe.		
[192.605(b) (1)][192.753(a)]	Does the operator's procedure require that each cast iron caulked bell and spigot joint that is subject to pressures of more than 25 psi gage must be sealed with mechanical clamp, or sealed with material/device which does not reduce flexibility, permanently bonds, and seals and bonds as prescribed in §192.753(a)(2)(iii)?	Not Applicable
[192.605(b) (1)][192.753(b)]	Does the operator's procedure require that when cast iron bell and spigot subject to 25 psig or less, joints, when exposed for any reason, must be sealed by means other than caulking?	Not Applicable
PROTECTING CAST-IRON PIPELINE PROCEDURES		Status
<u>Category Comment:</u> Nashville's gas system contains no cast iron pipe.		
[192.605(b) (1)][192.755(a)(1)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from vibrations from heavy construction equipment, trains, trucks, buses or blasting?	Not Applicable
[192.605(b) (1)][192.755(a)(2)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from impact forces by vehicles?	Not Applicable
[192.605(b) (1)][192.755(a)(3)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from earth movement?	Not Applicable
[192.605(b) (1)][192.755(a)(4)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from apparent future excavations near the pipeline?	Not Applicable
[192.605(b) (1)][192.755(a)(5)]	Does the operator's procedure require that when the operator has knowledge that the support for a	Not Applicable

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	segment of a buried cast-iron pipeline is disturbed must provide protection from other foreseeable outside forces which might subject the segment of pipeline to a bending stress?	
[192.605(b) (1)][192.755(b)]	Does the operator's procedure require the operator to as soon as feasible; provide permanent protection for the disturbed segment from external loads?	Not Applicable
WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES		Status
[192.13(c)][192.225(a)]	Does the operator's procedure require their welding procedures to be qualified under Section 5, 12 or Appendix A of API 1104 or Section IX of ASME Boiler and Pressure Code by destructive test?	Satisfactory
<u>General Comment:</u> See O&M, Section 18.4, Page 13, Welding Procedure Qualification		
[192.13(c)][192.225(b)]	Does the operator's procedure require each welding procedure to be recorded in detail, including the results of the qualifying tests?	Satisfactory
<u>General Comment:</u> See O&M, Section 18.1, Page 1, Welding Overview		
[192.13(c)][192.227(a)]	Does the operator's procedure require their welders be qualified in accordance with Section 6, 12 or Appendix A of API 1104 or Section IX of ASME Boiler and Pressure Code?	Satisfactory
<u>General Comment:</u> See O&M, Section 18.1, Page 1, Qualification Methods		
[192.13(c)][192.227(b)]	Does the operator's procedure require their welders be qualified under Section I of Appendix C to weld on lines that operate at <20% SMYS?	Satisfactory
<u>General Comment:</u> See O&M, Section 18.1, Page 1, Limitations of Qualification under API 1104		
[192.13(c)][192.229(a)]	Does the operator's procedure require a welder to successfully complete a destructive test to weld on compressor station piping and components?	Not Applicable
<u>General Comment:</u> Nashville's gas system contains no compressor stations.		
[192.13(c)][192.229(b)]	Does the operator's procedure require no welder may weld with a particular welding process unless, within the preceding 6 months, he has engaged in welding with that process?	Satisfactory
<u>General Comment:</u>		

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

See O&M, Section 18.1, Page 2, Limitation of Qualification under Appendix C

[192.13(c)][192.229(c)(1)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at > 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the sections 6, 9, 12 or Appendix A of API Standard 1104?	Satisfactory
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General Comment:

See O&M, Section 18.1, Page 1, Limitations of Qualification under API 1104

[192.13(c)][192.229(c)(2)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at < 20% SMYS unless the welder is tested in accordance with .229(c) (1) or requalifies under .229(d) (1) or (d) (2)?	Satisfactory
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General Comment:

See O&M, Section 18.1, Pages 1 & 2, Limitations of Qualification under API 1104

[192.13(c)][192.229(d)(1)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 1 year/15 months? OR	Satisfactory
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General Comment:

See O&M, Section 18.1, Page 1, Limitations of Qualification under API 1104

[192.13(c)][192.229(d)(2)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 7 1/2 months but at least twice per calendar year and has met the requirements of .229(d)(i)(ii)?	Satisfactory
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General Comment:

See O&M, Section 18.1, Page 1, Limitations of Qualification under API 1104

[192.13(c)][192.231]	Does the operator's procedure require that welding operations must be protected from weather conditions that would impair the quality of the completed weld?	Satisfactory
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General Comment:

See O&M, Section 18.6, Page 42, Weather Conditions When Welding

[192.13(c)][192.233]	Does the operator's procedure require that miter joints be made in accordance with this section?	Satisfactory
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General Comment:

The procedures are located on page 200 of the Operators of Small Gas Systems Guide referenced in Section 6 of the O&M.

[192.13(c)][192.235]	Does the operator's procedure require proper welding surface preparation and joint alignment?	Satisfactory
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General Comment:

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See O&M, Section 18.6, Page 39, Welding Checklists		
[192.13(c)][192.241(a)(1)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure compliance with the welding procedure?	Satisfactory
<u>General Comment:</u> See O&M, Section 18.7, Page 45		
[192.13(c)][192.241(a)(2)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure that the weld is acceptable in accordance with Section 9 of API 1104?	Satisfactory
<u>General Comment:</u> See O&M, Section 18.1, Page 4, API 1104 Qualification		
[192.13(c)][192.241(b)(1)]	Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except welds that are visually inspected and approved by a qualified welding inspector if the nominal pipe diameter is less than 6 inches? OR	Satisfactory
<u>General Comment:</u> See O&M, Section 18.1, Pages 4 & 5. Nashville's gas system contains no pipe greater than 6" in diameter.		
[192.13(c)][192.241(b)(2)]	Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except a pipeline that is to operate at a pressure that produces a hoop stress of less than 40% of SMYS and the welds are so limited in number that nondestructive testing is impractical?	Not Applicable
<u>General Comment:</u> Nashville's gas system does not operate above 20% or more of SMYS.		
[192.13(c)][192.241(c)]	Does the operator's procedure require that the acceptability of a weld, which is based on nondestructively tested or visually inspected, is determined according to the standards in Section 9 or Appendix A of API Standard 1104?	Satisfactory
<u>General Comment:</u> See O&M, Section 18.1, Page 4, API 1104 Qualification		
[192.13(c)][192.245(a)]	Does the operator's procedure require that each weld that is unacceptable must be removed or repaired?	Satisfactory

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<u>General Comment:</u> See O&M, Section 18.7, Page 43, Repair of Welds		
[192.13(c)][192.245(b)]	Does the operator's procedure require that each weld that is repaired must have the defect removed down to sound metal, and the segment to be repaired must be preheated if conditions exist which would adversely affect the quality of the weld repair?	Satisfactory
<u>General Comment:</u> See O&M, Section 18.7, Page 43, Repair of Welds		
[192.13(c)][192.245(c)]	Does the operator's procedure require that repair of a crack or any other defect in a previously repaired area must be in accordance with a written weld repair procedure qualified under §192.225?	Satisfactory
<u>General Comment:</u> See O&M, Section 18.7, Page 43, Repair of Welds		
Discuss with the operator regarding the use of a low hydrogen process when welding a sleeve for repair.		No
<u>General Comment:</u> Nashville's welding procedures already include low-hydrogen in-service welding procedure specifications. See O&M, Section 18, Page 1.		
TRANSMISSION NONDESTRUCTIVE TESTING PROCEDURES		Status
<u>Category Comment:</u> Nashville's gas system contains no transmission pipelines.		
[192.13(c)][192.243(a)]	Does the operator's procedure require that nondestructive testing of welds must be performed by any process, other than trepanning, that clearly indicates defects that may affect the integrity of the weld?	Not Applicable
[192.13(c)][192.243(b)(1)]	Does the operator's procedure require that nondestructive testing of welds must be performed in accordance with written procedures?	Not Applicable
[192.13(c)][192.243(b)(2)]	Does the operator's procedure require that nondestructive testing of welds must be performed by persons who have been trained and qualified in the established procedures and with the equipment employed in testing?	Not Applicable
[192.13(c)][192.243(c)]	Does the operator's procedure require that procedures must be established for the proper interpretation of each nondestructive test of a weld to ensure the acceptability of the weld under §192.241(c)?	Not Applicable
[192.13(c)][192.243(d)(1)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt	Not Applicable

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	welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 1 locations at least 10 percent?	
[192.13(c)][192.243(d)(2)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 2 locations at least 15 percent?	Not Applicable
[192.13(c)][192.243(d)(3)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 3 and Class 4 locations, at crossings of major or navigable rivers, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road crossings, 100% unless impracticable, then 90%?	Not Applicable
[192.13(c)][192.243(d)(4)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference at pipeline tie-ins, 100 %?	Not Applicable
[192.13(c)][192.243(e)]	Does the operator's procedure require that a sample of each welder's work for each day must be nondestructively tested, when nondestructive testing is required under §192.241(b), except for a welder whose work is isolated from the principal welding activity?	Not Applicable
[192.13(c)][192.243(f)]	Does the operator's procedure require that the operator must retain, for the life of the pipeline, a record showing by mile post, engineering station, or by geographic feature, the number of welds nondestructively tested, the number of welds rejected, and the disposition of the rejected welds?	Not Applicable
JOINING of PIPELINE MATERIALS OTHER THAN BY WELDING PROCEDURES		Status
[192.273(b)][192.283(b)]	Does the operator have qualified joining procedures for mechanical joints?	Not Applicable
<u>General Comment:</u> Nashville does not utilize mechanical joints.		
[192.281(a)][192.281(a)]	Does the operator's procedure prohibit joining plastic pipe by threaded or miter joint?	Satisfactory
<u>General Comment:</u>		

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The procedures are located on page 120-121 of the GPTC manual for gas transmission and distribution piping referenced in Section 6 of the O&M.		
[192.273(b)][192.283(a)]	Does the operator have qualified joining procedures for heat fusion, solvent cement, and adhesive joints?	Not Applicable
General Comment: Nashville does not utilize these joining methods on plastic pipe.		
[192.273(b)][192.283(c)]	Does the operator's procedure require that persons making and inspecting joints must have available a copy of the qualified joining procedure?	Satisfactory
General Comment: The procedures for plastic pipe are located in Section 19A, Page 17. Copies of which are also kept in the city trucks.		
[192.273(b)][192.285(a)]	Does the operator's procedure require that person making joints with plastic pipe must be qualified?	Satisfactory
General Comment: See O&M, Section 19A, Page 17.		
[192.273(b)][192.285(b)(1)]	Does the operator's procedure require the specimen joint to be visually examined during and after assembly or joining?	Satisfactory
General Comment: See O&M, Section 19A, Page 17.		
[192.273(b)][192.285(b)(2)]	Does the operator have procedures requiring when a specimen joint used for personnel qualification in the case of a heat fusion, solvent cement, or adhesive joint be tested under any one of the qualified test methods?	Not Applicable
General Comment: Nashville does not utilize these joining methods on plastic pipe.		
[192.273(b)][192.285(c)]	Does the operator have procedures that require a person to be requalified once each calendar year at intervals not exceeding 15 months, or after any production joint is found unacceptable by testing under 192.513?	Satisfactory
General Comment: See O&M, Section 19A, Page 17.		
[192.273(b)][192.285(d)]	Does the operator have a method to determine that each person making joints on plastic pipelines is qualified?	Satisfactory
General Comment: See O&M, Section 19A, Page 17.		

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[192.273(b)][192.287]	Does the operator's procedure require that person inspecting plastic pipe joints must be qualified by appropriate training or experience to evaluate plastic pipe joints?	Satisfactory
General Comment: See O&M, Section 19A, Page 17.		
CORROSION CONTROL PROCEDURES		Status
[192.605(b) (2)][192.453]	Does the operator's procedure require that corrosion control procedures required by .605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods?	Satisfactory
General Comment: The procedures for corrosion control are located in Section 24, Pages 1 and Section K on page 21 of the Operators of Small Gas Systems Guide.		
[192.605(b) (2)][192.455(a)]	Does the operator's procedure require that pipelines installed after July 31, 1971, buried segments must be externally coated and cathodically protected within one year after completion of construction? (see exceptions in code)	Satisfactory
General Comment: See O&M, Section 24, Page 1, Corrosion Control		
[192.605(b) (2)][192.455(e)]	Does the operator's procedure require that aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an environment with a natural pH in excess of 8, unless tests or experience indicate its suitability in the particular environment involved?	Not Applicable
General Comment: Nashville's gas system contains no aluminum pipe.		
[192.605(b) (2)][192.457(a)]	Does the operator's procedure require that all effectively coated steel transmission pipelines installed prior to August 1, 1971, must be cathodically protected?	Not Applicable
General Comment: Nashville's gas system contains no transmission pipelines.		
[192.605(b) (2)][192.457(b)]	Does the operator's procedure require that cathodic protection must be provided in areas of active corrosion for bare or ineffectively coated transmission lines, and bare or coated compressor station piping, regulator station, meter station piping, and (except for cast iron or ductile iron) bare or coated distribution	Satisfactory

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	lines installed before August 1, 1971?	
General Comment: <i>The procedure is located on page 172 of the GPTC manual referenced in Section 6 of the O&M.</i>		
[192.605(b) (2)][192.479(b)]	Does the operator's procedure require coating material to be suitable for the prevention of atmospheric corrosion?	Satisfactory
General Comment: <i>See O&M, Section 24, Page 2, Internal and Atmospheric</i>		
[192.605(b) (2)][192.459]	Does the operator's procedure require that whenever an operator has knowledge that any portion of a buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated and remedial actions taken when required?	Satisfactory
General Comment: <i>See O&M, Section 24, Page 1, Mains</i>		
[192.605(b) (2)][192.461(a), 192.461(b)]	Does the operator's procedure address the external protective coating requirements of the regulations?	Satisfactory
General Comment: <i>See O&M, Section 24, Pages 10-22</i>		
[192.605(b) (2)][192.463]	Does the operator's procedure require cathodic protection levels that comply with one or more applicable criteria contained in Appendix D?	Satisfactory
General Comment: <i>See O&M, Section 24, Page 1, Corrosion Control</i>		
[192.605(b) (2)][192.465(a)]	Does the operator's procedure require pipe-to-soil monitoring at a minimum of 1 per year/15 months and for separately protected short sections of main and transmission main or separately protected service lines require monitoring of 10% of the system to be surveyed annually?	Satisfactory
General Comment: <i>See O&M, Section 24, Page 1, Corrosion Control</i>		
[192.605(b) (2)][192.465(b)]	Does the operator's procedure require rectifier monitoring be conducted at a minimum of 6 per year/2 1/2 months?	Satisfactory
General Comment: <i>The procedures are located in Section 24-1 and page 176 of the GPTC manual referenced in Section 6.</i>		
[192.605(b) (2)][192.465(c)]	Does the operator's procedure require critical	Satisfactory

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	interference bond monitoring be conducted at a minimum of 6 per year/2 1/2 months and non-critical bond monitoring be conducted at a minimum of 1 per year/15 months?	
General Comment: See O&M, Section 30, Inspect or Test Cathodic Protections Bonds		
[192.605(b) (2)][192.465(d)]	Does the operator's procedure require that prompt remedial action to correct any deficiencies indicated by the monitoring?	Satisfactory
General Comment: The procedures are located in Section 24-1 and page 176 of the GPTC manual referenced in Section 6.		
[192.605(b) (2)][192.465(e)]	Does the operator's procedure require electrical surveys on bare and unprotected lines at a minimum of once per 3 years/39 months and must cathodically protect active corrosion areas, if found?	Not Applicable
General Comment: Nashville's gas system contains no bare or unprotected pipelines.		
[192.605(b) (2)][192.467(a)]	Does the operator's procedure require that each buried or submerged pipeline be electrically isolated from other underground metallic structures, unless interconnected?	Satisfactory
General Comment: The procedures are located in Section 24-1 and page 181 of the GPTC manual referenced in Section 6. Also see O&M, Section 30, Page 1.		
[192.605(b) (2)][192.467(b)]	Does the operator's procedure require that one or more insulating devices must be installed where electrical isolation of a portion of a pipeline is necessary to facilitate the application of corrosion control?	Satisfactory
General Comment: See O&M, Section 30, Page 3, Above Ground Isolation Devices		
[192.605(b) (2)][192.467(c)]	Does the operator's procedure require that each pipeline must be electrically isolated from metallic casings that are a part of the underground system?	Satisfactory
General Comment: See O&M, Section 30, Page 4, Casing Spacers		
[192.605(b) (2)][192.467(d)]	Does the operator's procedure require that inspection and electrical tests must be made to assure that electrical isolation is adequate?	Satisfactory
General Comment:		

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See O&M, Section 24, Page 1		
[192.605(b) (2)][192.469]	Does the operator's procedure define how a sufficient number of test stations or contact points for electrical measurement are established to determine the adequacy of cathodic protection?	Satisfactory
<u>General Comment:</u> See O&M, Section 24, Page 1 and page 184 of the GPTC manual referenced in Section 6.		
[192.605(b) (2)][192.471]	Does the operator's procedure define how test leads will be installed and maintained?	Satisfactory
<u>General Comment:</u> See O&M, Section 24, Page 1 and page 184 of the GPTC manual referenced in Section 6. The detailed procedures regarding installation are located in Section 30, Pages 1-3.		
[192.605(b) (2)][192.473(a)]	Does the operator's procedure require the determination of how interference currents are affecting the cathodic protection system?	Satisfactory
<u>General Comment:</u> See O&M, Section 30, Pages 1 & 2.		
[192.605(b) (2)][192.473(b)]	Does the operator's procedure require the determination that impressed current type cathodic protection system or galvanic anode system are designed and installed to minimize any adverse effects on existing adjacent underground metallic structures?	Satisfactory
<u>General Comment:</u> The procedures are located on page 185 of the GPTC manual referenced in Section 6 of the O&M.		
[192.605(b) (2)][192.475(a)]	Does the operator's procedure require that if corrosive gas is transported by pipeline, the corrosive effect of the gas on the pipeline must be investigated and steps taken to minimize internal corrosion?	Not Applicable
<u>General Comment:</u> Nashville does not transport corrosive gas.		
[192.605(b) (2)][192.475(b)]	Does the operator's procedure require that whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion?	Satisfactory
<u>General Comment:</u> See O&M, Section 24, Page 2, Internal & Atmospheric		
[192.605(b) (2)][192.475(b)(1)]	Does the operator's procedure require that when internal corrosion is observed that the adjacent pipe will be inspected for internal corrosion?	Satisfactory
<u>General Comment:</u>		

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<i>See O&M, Section 24, Page 2, Internal & Atmospheric</i>		
[192.605(b) (2)][192.475(b)(2)]	Does the operator's procedure require replacement of pipe when internal corrosion is observed to the extent required by the applicable paragraphs of §§192.485, 192.487, or 192,489?	Satisfactory
<u>General Comment:</u> <i>See O&M, Section 24, Page 2, Internal & Atmospheric</i>		
[192.605(b) (2)][192.475(b)(3)]	Does the operator's procedure require the steps that must be taken when internal corrosion is discovered?	Satisfactory
<u>General Comment:</u> <i>See O&M, Section 24, Page 2, Internal & Atmospheric</i>		
[192.605(b) (2)][192.476(a)]	Does the operator's procedure require features incorporated into its design and construction of transmission lines installed after May 23, 2007, to reduce internal corrosion?	Not Applicable
<u>General Comment:</u> <i>Nashville's gas system contains no transmission pipelines.</i>		
[192.605(b) (2)][192.476(c)]	Does the operator's procedure require an evaluation of the impact of internal corrosion to the downstream portion of the existing pipeline when a transmission pipeline configuration is changed to provide for removal of liquids and monitoring of internal corrosion as appropriate?	Not Applicable
<u>General Comment:</u> <i>Nashville's gas system contains no transmission pipelines.</i>		
[192.605(b) (2)][192.477]	Does the operator's procedure require, if corrosive gas is being transported, the use of internal corrosion control coupons, or other suitable means of monitoring at a minimum of 2 per year/7 1/2 months?	Not Applicable
<u>General Comment:</u> <i>Nashville does not transport corrosive gas.</i>		
[192.605(b) (2)][192.479(a)]	Does the operator's procedure require each exposed pipe, including soil-to-air interface, to be cleaned and coated?	Satisfactory
<u>General Comment:</u> <i>See O&M, Section 24, Page 2, Internal & Atmospheric</i>		
[192.605(b) (2)][192.481(a)]	Does the operator's procedure require atmospheric corrosion control monitoring at a minimum of 1 per 3 years/39 months?	Satisfactory
<u>General Comment:</u>		

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The operator's procedures include monthly atmospheric corrosion control monitoring utilizing foot patrols which are documented on the meter readers patrol report which indicates a place to mark atmospheric corrosion. The foot patrol procedure is located in Section 26, Page 1.		
[192.605(b) (2)][192.481(b)]	Does the operator's procedure require particular attention to atmospheric corrosion on exposed pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water?	Satisfactory
General Comment: The procedures are located in Section 24-2 and the GPTC manual page 192 referenced in Section 6 of the O&M.		
[192.605(b) (2)][192.481(c)]	Does the operator's procedure require protection be provided if atmospheric corrosion is discovered?	Satisfactory
General Comment: See O&M, Section 24, Page 2.		
[192.605(b) (2)][192.483]	Does the operator's procedure require that replacement pipe be coated and cathodically protected?	Satisfactory
General Comment: See O&M, Section 17, Page 3		
[192.605(b) (2)][192.485(a)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if general corrosion has reduced the wall thickness?	Not Applicable
General Comment: Nashville's gas system contains no transmission pipelines.		
[192.605(b) (2)][192.485(b)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if localized corrosion has reduced the wall thickness?	Not Applicable
General Comment: Nashville's gas system contains no transmission pipelines.		
[192.605(b) (2)][192.485(c)]	Does the operator's procedure require the use of Rstreng or B-31G to determine the remaining wall strength?	Not Applicable
General Comment: Nashville's gas system contains no transmission pipelines.		
[192.605(b) (2)][192.487(a)]	Does the operator have procedures to replace or repair distribution pipe if general corrosion has reduced the wall thickness?	Satisfactory
General Comment:		

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See O&M, Section 17, Page 3

[192.605(b) (2)][192.487(b)]	Does the operator have procedures to replace or repair distribution pipe if localized corrosion has reduced the wall thickness?	Satisfactory
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General Comment:

See O&M, Section 17, Page 3

[192.605(b) (2)][192.489(a)]	Does the operator have procedures to replace pipe if general graphitization is discovered on cast or ductile iron pipe?	Not Applicable
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General Comment:

Nashville's gas system contains no cast iron pipe.

[192.605(b) (2)][192.489(b)]	Does the operator have procedures to repair or replace pipe or seal by internal sealing methods when localized graphitization is discovered on cast or ductile iron pipe?	Not Applicable
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General Comment:

Nashville's gas system contains no cast iron pipe.

[192.605(b) (2)][192.491(a)]	Does the operator have procedures requiring the retention of records and maps to show the location of cathodically protected pipe, facilities, anodes, and bonded structures?	Satisfactory
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General Comment:

See O&M, Section 24, Page 1 and in the GUA Guide, Page 26.

[192.605(b) (2)][192.491(b)]	Does the operator have procedures requiring the retention of records under .491(a) for the life of the pipeline?	Satisfactory
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General Comment:

See O&M, Section 24, Page 1 and in the GUA Guide, Page 26.

[192.605(b) (2)][192.491(c)]	Does the operator have procedures that require the retention of testing, surveys, or inspections records which detail the adequacy of the corrosion control measures for a minimum of 5 years?	Satisfactory
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General Comment:

See O&M, Section 24, Page 1 and in the GUA Guide, Page 26.

UPRATING PROCEDURES		Status
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Category Comment:

There are currently no plans to uprate any part of Nashville's gas system. In the event that uprating is required, a plan will be developed at that time.

[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating	Not Applicable
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	requirements which meet Subpart K and include pressure raised in increments?	
[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include section checked before further pressure increase?	Not Applicable
[192.13(c)][192.553(a)(2)]	Does the operator's procedure include uprating requirements which meet Subpart K and include hazardous leaks repaired between increments?	Not Applicable
[192.13(c)][192.553(b)]	Does the operator's procedure include uprating requirements which meet Subpart K and include records kept for life of system?	Not Applicable
TRAINING		Status
<u>Category Comment:</u>		
<i>The training procedures are located in Section 39 -1 and Section 3.1 of the GUA gas operators handbook which include training by group meetings, hands on, verbal, state sponsored conferences and governmental agencies.</i>		
[520.10(a)(1)]	Does the operator's procedure contain adequate descriptions of types of training each job classification requires, including those of field foreman, field crew leaders, leak inspectors, new construction inspectors, servicemen and corrosion technicians and/or equivalent classifications?	Satisfactory
[520.10(a)(2)]	Does the operator's procedure include scheduling of verbal instruction and/or on-the-job training for each job classification?	Satisfactory
[520.10(a)(3)]	Does the operator's procedure include provisions for evaluating the performance of personnel to assure their competency in performing the work assigned to them?	Satisfactory
[520.10(a)(4)]	Does the operator's procedure include subject matter relating to recognition of potential hazards, and actions to be taken toward prevention of accidents?	Satisfactory
[520.10(a)(5)]	Are the operator's procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Satisfactory
[520.10(a)(6)]	Are the operator's procedures made a part of the gas system's operation, inspection and maintenance plan, and filed with the Commission?	Satisfactory
[520.10(b)]	Does the operator's procedure require that the operator/personnel (municipal/master meter) attend regularly scheduled instructional courses held by utility companies or participate in courses such as the IGT Gas Distribution Home Study Course, or programs developed and presented by community colleges, vocational schools, universities, consultants or other	Satisfactory

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	recognized gas distribution oriented agencies?	
[520.10(a)]	Does the operator's procedure specify methods to be used for training, including frequency and subject matter of training?	Satisfactory

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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